

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
)
V.) No. 07 CR 755
) Magistrate Judge Maria Valdez
)
JAROSLAVA KLEPLOVA)

MOTION FOR RELEASE ON BOND

Defendant JAROSLAVA KLEPLOVA, by the Federal Defender Program and its attorney JOHN F. MURPHY, respectfully requests that the Court enter an order vacating the detention order previously entered by this Court and enter an order releasing the defendant on a bond secured by \$5,000.00, and regular, daily contact with the U.S. Pretrial Services office. In further support, defendant further states:

1. On November 15, 2007, Ms. Kleplova was charged in a six-count indictment with allegations of mail fraud. On the same day, a warrant was issued for her arrest.
2. On November 26, 2007, Ms. Kleplova was arrested, and appeared before this Court for an initial appearance.
3. On November 29, 2007, Ms. Kleplova appeared before this Court for a detention hearing. At that time, upon advice of counsel, Ms. Kleplova waived the hearing without prejudice to raise the bond issue at a later time. This Court, therefore, ordered Ms. Kleplova detained.
4. On December 11, 2007, at a status hearing before Judge Robert Gettleman, counsel for

Ms. Kleplova indicated that he wished to schedule a detention hearing. Judge Gettleman indicated that the bond matter, in the first instance, should be raised before this Court.

5. Ms. Kleplova requests that the Court vacate the order of detention and enter a release order granting her a \$50,000 bond, secured by a 10% cash deposit of \$5,000. Additional conditions of release would require that she maintain regularly daily contact with the U.S. Pretrial Services office, and any other reasonable conditions the Court requires.

6. This combination of conditions will assure that Ms. Kleplova does not pose a risk of flight as the government has suggested. No presumption against release exists in this case. Consequently, these proposed terms reasonably assure the appearance of Ms. Kleplova as required. 18 U.S.C. §3142.

Therefore, the defendant respectfully requests that this Court enter an directing that the detention order previously imposed be vacated and the defendant be released pursuant to the above-suggested conditions.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
Terence F. MacCarthy
Executive Director

By: s/John F. Murphy
John F. Murphy

FEDERAL DEFENDER PROGRAM
55 E. Monroe Street,
Suite 2800
Chicago, IL 60603
(312)621-8352

CERTIFICATE OF SERVICE

The undersigned, John F. Murphy, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CIV.P5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document:

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was served pursuant to the district court's ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on December 13, 2007, to counsel/parties that are non-ECF filers:

By: s/John F. Murphy
JOHN F. MURPHY
FEDERAL DEFENDER PROGRAM
55 E. Monroe St., Suite 2800
Chicago, Illinois 60603
(312) 621-8352

